

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

MICHELLE BOND,

Defendant.

Docket No. 1:24-cr-000494-GBD

**DECLARATION OF ERIC R. BRESLIN IN SUPPORT OF MICHELLE BOND'S  
OMNIBUS PRETRIAL MOTION**

Eric R. Breslin declares and states as follows:

1. I am a partner at the law firm of Duane Morris LLP, counsel for Michelle Bond in the above-captioned matter.
2. Attached as Exhibit is a copy of a March 26, 2025 Declaration of Michelle Bond, filed in an adversary proceeding in the Bankruptcy Court for the District of Delaware.
3. Attached as Exhibit B is a copy of USAO\_00000001, produced in this litigation. Redactions are made to conceal personal information in accordance with the Southern District of New York's filing rules.
4. Attached as Exhibit C is a copy of an April 28, 2023, email containing notes of the government's call with defense attorneys for Ms. Bond and Ms. Salame, originally filed in the action *United States v. Salame*, 22-cr-00673-LAK (S.D.N.Y.).
5. Attached as Exhibit D is a copy of a June 13, 2024 email chain between the government and attorneys for Ms. Bond and Mr. Salame, originally filed in the action *United States v. Salame*, 22-cr-00673-LAK (S.D.N.Y.).

6. Attached as Exhibit E is a May 25, 2023 email purporting to set forth notes of a call between the government and attorneys for Ms. Bond and Mr. Salame.

7. Attached as Exhibit F is a copy of the FBI 302 reporting on Ms. Bond's statements during a surety call, produced by the government at USAO\_00057857.

8. Attached as Exhibit G is a declaration by Ryan Salame, filed in the action *United States v. Salame*, 22-cr-00673-LAK (S.D.N.Y.).

9. Attached as Exhibit H are the caption page and table of contents for trial transcripts in Ms. Bond's matrimonial action.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Dated: May 7, 2025  
New York, New York

/s/ Eric R. Breslin  
Eric R. Breslin